

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

Karen Dieter,)
)
Plaintiff,) Judge Kapala
)
v.) Case No. 07-06467
)
Honeywell International Inc.)
)
Defendant.)

JOINT INITIAL STATUS REPORT

Plaintiff Karen Dieter (“Dieter”) and Defendant, Honeywell International, Inc. (“Honeywell”), by and through their respective undersigned attorneys, hereby submit the following Joint Initial Status Report:

1. **Nature of the Case:** The Complaint alleges that Plaintiff was discharged in retaliation for the exercise of her worker’s compensation rights. Honeywell denies this and states that Plaintiff was terminated for non-retaliatory reasons.

2. **Discovery:** The parties have agreed, and request that the Court approve, the following discovery schedule:

(a) The parties are to exchange **initial disclosures** pursuant to Fed. R. Civ. P. 26(a)(1) no later than January 25, 2008.

(b) The parties are to complete all **fact discovery** by June 16, 2008.

(c) At this time, the parties do not anticipate a need for **expert discovery**.

The parties recommend waiting until the close of fact discovery to assess whether experts are needed in this case, and, if necessary, to set for expert discovery.

Should the Court prefer to set an expert discovery schedule now, the parties

recommend the following:

- Expert Disclosures, with delivery of expert reports and Rule 26(a)(2) Disclosures by July 30, 2008;
- Expert Discovery completed by August 30, 2008.

4. **Status Conference:** The parties respectfully suggest that the Court set a status conference for May ____, 2008.

5. The parties anticipate that a trial of this matter would take approximately four days, and that the case could be ready for trial by the last quarter of 2008.

WHEREFORE, Plaintiff Karen Dieter and Defendant, Honeywell International, Inc., respectfully request that an Order be entered setting the discovery schedule described above.

Respectfully submitted,

Karen Dieter

By: s/ Rene Hernandez
One of her Attorneys

Rene Hernandez, Esq.
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Honeywell International, Inc.

By: s/ Michael H. Cramer
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Dated: January 2, 2008

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on January 2, 2008 he electronically filed the foregoing Joint Initial Status Report/CMO. Notice of this filing will be sent via the Court's electronic filing system to:

Rene Hernandez, Esq.
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/s/ Michael H. Cramer _____